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January 3, 2020

VIA ECF

The Honorable Vernon S. Broderick
United States District Judge
40 Foley Square
New York, NY 10007

**Re: U.S.A. v. Lorenzo, Francis, et al.
Case No.: 15-Cr-00706 (VSB)**

Honorable Judge Broderick:

The Government (through AUSA Daniel Richenthal) has no objection to the following request. Defendant, Francis Lorenzo, requests permission from this Court to travel domestically while on supervised release provided he complies with all current conditions and all specific travel requirements of his Supervised Release Officer.

On December 9, 2019, Mr. Lorenzo was sentenced to time served in the above matter. This Court also required that Mr. Lorenzo serve two (2) years supervised release. Prior to sentencing, Mr. Lorenzo spent approximately four (4) years under strict supervision pursuant to his pre-trial/sentence bail conditions. During that time, Mr. Lorenzo dutifully abided by all of his pre-trial/sentence bail conditions without any incident whatsoever. Undersigned counsel has conferred with USPO Godwin Ogunmefun who advised that his office does not permit domestic travel out of the jurisdiction during the first year of supervised release without an Order of the Court.

**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 3/2/2020

GRAYROBINSON
PROFESSIONAL ASSOCIATION

The Honorable Vernon S. Broderick
January 3, 2020
Page 2

Based on the foregoing, we respectfully request that Your Honor enter an Order permitting Mr. Lorenzo to travel domestically while on supervised released provided he complies with all current conditions and all specific travel requirements of his Supervised Release Officer.

Respectfully submitted,


for *Ada Sengal*
BRIAN H. BIEBER

BHB

cc: Janis Echenberg, AUSA (via e-mail only);
Daniel Richenthal, AUSA (via e-mail only);
Douglas Zolkind, AUSA (via e-mail only).